

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE  
PERIOD MAY 1, 2022 THROUGH MAY 31, 2022**

Debtor: LTL Management LLC

Applicant: Taurig Law LLC

Case No.: 21-30589-MBK

Client: Counsel to Robert J. Keach, Esq.,  
(the "Fee Examiner")

Chapter: 11

Case Filed: October 14, 2021 (the "Petition  
Date")

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**SECTION 1  
FEE SUMMARY**

☒ Monthly Fee Application No. 2 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from May 1, 2022 through May 31, 2022 (the "First Statement Period").

|                                |    |          |
|--------------------------------|----|----------|
| Total Fees:                    | \$ | 2,592.50 |
| Total Disbursements:           | \$ | 0.00     |
| Total Fees Plus Disbursements: | \$ | 2,592.50 |
| Minus 20% Holdback of Fees:    | \$ | 518.50   |
| Amount Sought at this Time:    | \$ | 2,074.00 |

|                                 | <u>FEEES</u>      | <u>EXPENSES</u> |
|---------------------------------|-------------------|-----------------|
| Total Previous Fees Requested:  | <u>\$4,717.50</u> | <u>\$0.00</u>   |
| Total Fees Allowed to Date:     | <u>\$0.00</u>     | <u>\$0.00</u>   |
| Total Retainer (If Applicable): | <u>\$0.00</u>     | <u>\$0.00</u>   |
| Total Holdback (If Applicable): | <u>\$ 943.50</u>  | <u>\$0.00</u>   |
| Total Received by Applicant:    | <u>\$3,774.00</u> | <u>\$0.00</u>   |

**COMPENSATION BY: PROFESSIONAL**  
**MAY 1, 2022 THROUGH MAY 31, 2022**

The attorney(s) who rendered professional services in these chapter 11 cases from May 1, 2022 through May 31, 2022 (the "Fee Period") are:

| <b>Name of Professional:<br/>Partner/Member</b> | <b>Year Admitted</b> | <b>Hourly Rate</b> | <b>Total Hours Billed</b> | <b>Total Fees</b> |
|---|----------------------|--------------------|---------------------------|-------------------|
| Jeffrey Traurig                                 | 1997                 | \$425.00           | 6.1                       | \$ 2,592.50       |

The total fees for the Fee Period are:

| <b>Professionals</b>                     | <b>Blended Rate</b> | <b>Total Hours Billed</b> | <b>Total Fees</b>  |
|--|---------------------|---------------------------|--------------------|
| Partner/Member:                          | \$425.00            | 6.1                       | \$ 2,592.50        |
| <b>Blended Attorney Rate:</b>            | \$425.00            | 6.1                       | \$ 2,592.50        |
| <b>Blended Rate for All Timekeepers:</b> | \$425.00            | 6.1                       | \$ 2,592.50        |
| <b>Total Fees Incurred:</b>              |                     |                           | <b>\$ 2,592.50</b> |

**SECTION II  
SUMMARY OF SERVICES**

**COMPENSATION BY WORK TASK CODE FOR SERVICES RENDERED BY  
TRAURIG LAW LLC  
FOR THE PERIOD MAY 1, 2022 THROUGH MAY 31, 2022**

| DESCRIPTION                           | HOURS      | AMOUNT             |
|---------------------------------------|------------|--------------------|
| Case Administration/General           | N/A        | N/A                |
| Employment and Fee Applications       | 3.2        | \$ 1,360.00        |
| Employment and Fee Reports/Objections | 2.9        | \$ 1,232.50        |
| <b>Total Fees Requested</b>           | <b>6.1</b> | <b>\$ 2,592.50</b> |

**SECTION III  
SUMMARY OF DISBURSEMENTS**

**DISBURSEMENT SUMMARY BY TRAURIG LAW LLC  
FOR THE PERIOD MAY 1, 2022 THROUGH MAY 31, 2022**

| <b>DISBURSEMENTS</b>        | <b>AMOUNT</b> |
|-----------------------------|---------------|
| N/A                         | --            |
|                             |               |
| <b>DISBURSEMENTS TOTALS</b> | <b>\$0.00</b> |

#### **SECTION IV CASE HISTORY**

- |  |  |
|--|--|
| (1) Date cases filed:  | October 14, 2021   |
| (2) Chapter under which case commenced:  | Chapter 11   |
| (3) Date of retention order:   | April 5, 2022 [Dkt. 1966] (the “ <u>Retention Order</u> ”). <sup>1</sup> |
| (4) Summarize in brief the benefits to the estate and attach supplements as needed | SEE BELOW  |

During the Second Statement Period, Traurig Law LLC (“Traurig Law”) provided the following services to Robert J. Keach, the Fee Examiner, including, but not limited to, the following:

##### *Employment and Fee Applications*

- Drafted monthly fee statement for Traurig Law; Coordinate with Bernstein, Shur, Sawyer & Nelson, P.A. (“BSSN”) re BSSN monthly fee statement and interim compensation order; review and file monthly fee statements for Traurig Law and BSSN.
- Coordinated with BSSN regarding service of monthly fee statement, and review and file certificate of service.

##### *Employment and Fee Reports/Objections*

- Calls with the Fee Examiner and Office of the United States Trustee regarding status of the Fee Examiner review and report.
- Reviewed and filed Fee Examiner first final report for interim fee applications.

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<sup>1</sup> The Retention Order is attached hereto as Exhibit A

(5) Anticipated distribution to creditors:

|                                  |                       |
|----------------------------------|-----------------------|
| (a) Administration expense:      | Unknown at this time. |
| (b) Secured creditors:           | Unknown at this time. |
| (c) Priority creditors:          | Unknown at this time. |
| (d) General unsecured creditors: | Unknown at this time. |

(6) Final disposition of case and percentage of dividend paid to creditors

Final dividend percentages are unknown at this time.

I certify under penalty of perjury that the above is true.

Date: June 27, 2022

/s/ Jeffrey Traurig  
Jeffrey Traurig

**EXHIBIT A**

Retention Order



Order Filed on April 5, 2022  
by Clerk  
U.S. Bankruptcy Court  
District of New Jersey

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY**

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

Jeffrey Traurig  
**TRAURIG LAW LLC**  
One University Plaza, Suite 124  
Hackensack, NJ 07601  
Tel: (646) 974-8650  
E-mail: jtraurig@trauriglawn.com  
*Proposed Local Counsel to the Fee Examiner*

In Re:

LTL MANAGEMENT LLC,  
  
Debtor

Case No.: 21-30589 (MBK)

Judge: Michael B. Kaplan

Chapter 11

**ORDER AUTHORIZING RETENTION OF TRAURIG LAW LLC  
AS COUNSEL TO THE FEE EXAMINER**

The relief set forth on the following page two (2) and three (3) is hereby **ORDERED**.

**DATED: April 5, 2022**

  
Honorable Michael B. Kaplan  
United States Bankruptcy Judge



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LTL MANAGEMENT LLC

Chapter 11, Case No.: 21-30589 (MBK)

Order Authorizing Retention of Traurig Law LLC As Counsel To The Fee Examiner

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Upon the applicant's, Robert J. Keach (the "Fee Examiner"), request for authorization to retain Traurig Law LLC ("Traurig") as counsel to the Fee Examiner, it is hereby **ORDERED**:

1. The Fee Examiner is authorized to retain Traurig in the professional capacity noted in the Application.

The professional's address is: Traurig Law LLC  
One University Plaza, Suite 124  
Hackensack, NJ 07601

2. As provided in the *Order Appointing an Independent Fee Examiner and Establishing Procedures* [Docket No. 1922, ¶ 13], the "fees and expenses of the Fee Examiner, and any counsel retained pursuant to court order, shall be subject to application and review pursuant to section 330 of the Bankruptcy Code, Bankruptcy Rule 2016, Local Bankruptcy Rule 2016-1, the U.S. Trustee Guidelines, and the Interim Compensation Order, and shall be paid from the Debtor's estate as an administrative expense under section 503(b)(2) of the Bankruptcy Code. The Fee Examiner's expenses and those of any counsel retained pursuant to court order, shall be subject to the information detail requirements set forth in D.N.J. LBR 2016-1."

3. If the professional requested a waiver as noted below, it is ☐ Granted ☐ Denied.

☐ Waiver, under D.N.J. LBR 2014-2(b), of the requirements of D.N.J. LBR 2016-1.

☐ Waiver, under D.N.J. LBR 2014-3, of the requirements of D.N.J. LBR 2016-1 in a chapter 13 case. Payment to the professional may only be made after satisfactory completion of services.

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LTL MANAGEMENT LLC

Chapter 11, Case No.: 21-30589 (MBK)

Order Authorizing Retention of Traurig Law LLC As Counsel To The Fee Examiner

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4. Traurig will only bill 50% for non-working travel and shall not seek the reimbursement of any fees or costs including attorney fees and costs, arising from the defense of any of Traurig's fee applications in this case.
5. Traurig will agree to make a reasonable effort to comply with the U.S. Trustee's requests for information and additional disclosures as set forth in the Guidelines for Reviewing Applications for Compensation and Reimbursement of Expenses Filed under 11 U.S.C. § 330 by Attorneys in Larger Chapter 11 Cases Effective as of November 1, 2013 (the "U.S. Trustee Guidelines").
6. Traurig will use the billing and expense categories set forth in the US Trustee Guidelines (Exhibit D-1 "Summary of Compensation Requested by Project Category"), among other categories.
7. Traurig will provide any and all monthly fee statements, interim fee applications, and final fee tab applications in "LEDES" or other satisfactory format to the United States Trustee.
8. The effective date of retention is the date the application was filed with the Court.

**EXHIBIT B**

Invoice/Time Records

**Taurig Law LLC**

One University Plaza, Ste 124  
Hackensack, NJ 07601

INVOICE

**Robert J. Keach Fee Examiner -- LTL Management**

**Invoice 22024**

|                     |              |
|---------------------|--------------|
| <b>Date</b>         | Jun 17, 2022 |
| <b>Terms</b>        | Court Order  |
| <b>Service Thru</b> | May 31, 2022 |

**In Reference To: LTL Management LLC (Fees)**

| <b>Date</b>                                   | <b>By</b> | <b>Services</b>  | <b>Rate</b> | <b>Hours</b> | <b>Amount</b>     |
|---|-----------|--|-------------|--------------|-------------------|
| <b>Employment and Fee Applications</b>        |           |  |             |              |                   |
| 05/02/2022                                    | JT        | Begin drafting/preparing monthly fee statement form for use in LTL (.4).   | \$ 425.00   | 0.40         | \$ 170.00         |
| 05/17/2022                                    | JT        | Drafting monthly fee statement for Taurig Law (.9), email with and call with L. Boots re preparation of monthly fee statements (.2).   | \$ 425.00   | 1.10         | \$ 467.50         |
| 05/25/2022                                    | JT        | Review interim compensation order, emails with and call with L. Boots re monthly fee statement status, filing issues and coordination of service for BSSN and Taurig Law monthly fee statements (.2); review and finalize, prepare monthly fee statement with exhibits for Taurig Law (.3); review and comment on draft of Fee Examiner and BSSN monthly fee statement (.2); Prepare LEDES file and email to A. Stewart in connection with submission to UST (.1); review further email from and call with L. Boots re BSSN monthly fee statement, finalizing same (.2). | \$ 425.00   | 1.00         | \$ 425.00         |
| 05/26/2022                                    | JT        | Emails with A. Quirk re finalizing monthly fee statements for filing and coordination of service, review revised BSSN and Fee Examiner monthly fee statements in advance of filing (.2); file Taurig Law, BSSN and Fee Examiner monthly fee statements (.3).   | \$ 425.00   | 0.50         | \$ 212.50         |
| 05/27/2022                                    | JT        | Emails with A. Quirk re certificate of service re monthly statement, review and comment on same, file certificate of service and review email to UST office re LEDES file (.2).  | \$ 425.00   | 0.20         | \$ 85.00          |
| <b>Employment and Fee Applications Total:</b> |           |  |             | <b>3.20</b>  | <b>\$1,360.00</b> |
| <b>Employment and Fee Reports/Objections</b>  |           |  |             |              |                   |
| 05/16/2022                                    | JT        | Call with R. Keach and UST office (L. Bielskie, J. Sponder and L. Richenderfer) regarding status of Fee Examiner review and upcoming report.   | \$ 425.00   | 0.40         | \$ 170.00         |

**Taurig Law LLC**

One University Plaza, Ste 124  
Hackensack, NJ 07601

# INVOICE

**Robert J. Keach Fee Examiner -- LTL Management**

**Invoice 22024**

|                     |              |
|---------------------|--------------|
| <b>Date</b>         | Jun 17, 2022 |
| <b>Terms</b>        | Court Order  |
| <b>Service Thru</b> | May 31, 2022 |

|            |    |   |           |      |           |
|------------|----|---|-----------|------|-----------|
| 05/18/2022 | JT | Follow-up Call with R. Keach and UST office (L. Bielskie, J. Sponder and L. Richenderfer) regarding status of Fee Examiner reports and fee review issues (.3).  | \$ 425.00 | 0.30 | \$ 127.50 |
| 05/25/2022 | JT | Call with L. Boots re Fee Examiner report status and re additional talc professional retentions (.1).   | \$ 425.00 | 0.10 | \$ 42.50  |
| 05/31/2022 | JT | Emails with L. Boots re status of Fee Examiner report, resolutions and filing issues (.2); Call with L. Boots regarding finalizing Fee Examiner report, proposed order and filing/service coordination (.2); review proposed order, exhibits and preparing same for filing (.2); review Fee Examiner's consolidated first final report for interim fee applications (.9); further call with L. Boots re comments to order and report and coordinate additional revisions (.2); file Fee Examiner's consolidated first final report for interim fee applications and link docket events to 17 professionals' applications (.3); review and file certificate of service of same (.1). | \$ 425.00 | 2.10 | \$ 892.50 |

**Employment and Fee Reports/Objections Total: 2.90 \$1,232.50**

**Total Fees Amount: 6.10 \$2,592.50**

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**Total Hours 6.10 hrs**

**Total Fees \$ 2,592.50**

**Total Invoice Amount \$ 2,592.50**

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